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OCT 07 2002

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0011-03

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

TRANSMITTAL OF RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS AND THE REVISED PROJECT SPECIFIC PLAN FOR INVESTIGATION OF SOIL STAGED IN QUONSET HUT NO. 1

Reference: Letter, T. Schneider to J. Reising, "PSP for Investigation of Soil Staged in Quonset Hut No. 1," dated August 27, 2002

Enclosed for your approval are responses to the Ohio Environmental Protection Agency (OEPA) comments and the revised Project Specific Plan (PSP) for Investigation of Soil Staged in Quonset Hut No. 1. This is in regard to the soil that originated north of the former Maintenance Building and was identified as characteristic for trichloroethene under the Resource Conservation and Recovery Act (RCRA). This soil was excavated in late 2001 and is currently staged in Quonset Hut No. 1. This PSP has been revised to incorporate OEPA's comments, and now includes a second round of sampling to determine its RCRA status.

If you have any questions or need further information, please contact Robert Janke at (513) 648-3124.

Sincerely,

Johnny Reising

FEMP:R.J. Janke

Johnny W. Reising
Fernald Remedial Action
Project Manager

Enclosure: As Stated

cc w/enclosure:
R. J. Janke, OH/FEMP
T. Schneider, OEPA-Dayton (three copies of enclosure)
M. Cullerton, Tetra Tech
AR Coordinator, Fluor Fernald, Inc./MS78

cc w/o enclosure:
R. Greenberg, EM-31/CLOV
N. Hallein, EM-31/CLOV
J. Reising, OH/FEMP
D. Carr, Fluor Fernald, Inc./MS2
J. Chiou, Fluor Fernald, Inc./MS64
T. Hagen, Fluor Fernald, Inc./MS65-2
E. Kroger, Fluor Fernald, Inc./MS64
F. Miller, Fluor Fernald, Inc./MS64
ECDC, Fluor Fernald, Inc./MS

RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE DRAFT PROJECT SPECIFIC PLAN FOR INVESTIGATION OF SOIL STAGED IN QUONSET HUT NO. 1 (20803-PSP-0001, REVISION A)

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

SPECIFIC COMMENTS

Commenting Organization: Ohio EPA — Commentator: OFFO
Section #: 1.0 — Pg. #: 1-1 — Line #: 4-11 — Code: C
Original Comment #: 1

Comment: In checking with the 3A/4A Implementation Plan, it states that the RCRA soil excavated from behind Building 12 was taken to the Soil Treatment Area SP-3 (TASP-3). However, neither the 3A/4A Implementation Plan nor the PSP explains how long the soil was staged in the SP-3 area. In addition, the documents do not mention how the soil was transferred, when it was transferred, or if it was directly placed from 3A/4A to Quonset Hut No. 1. Please clarify.

Response: The soil from behind Building 12 was taken directly to Quonset Hut No. 1 after excavation in late 2001. Although the 3A/4A Implementation Plan stated that it would be taken to SP-3, this was not the case. It was later identified that Quonset Hut No. 1 was a better location for staging and treatment per Letter DOE-0148-02, "Request for Concurrence to Initiate Soil Stockpiles," dated November 21, 2001 and the subsequent concurrences.

Action: Text will be added to Section 1.1 of the Project Specific Plan (PSP) to clarify that this soil was excavated and taken directly to Quonset Hut No. 1.

Commenting Organization: Ohio EPA — Commentator: OFFO
Section #: 2.1 — Pg. #: 2-1 — Line #: 13 — Code: C
Original Comment #: 2

Comment: The text states that there are sample collection limitations. Please explain.

Response: Sampling limitations are due to the location of the pile in Quonset Hut No. 1. The availability of only access two doors, limited access to the sides of the pile, and the presence of a roof prevented the use of the Geoprobe. The steepness of the pile and potential for collapse of the soil on the pile may limit the ability of sampling technicians to climb on top of the pile collect samples by hand. There are also safety issues related to running vehicles or generators inside of the structure, as identified in Section 4 of the PSP.

Action: Section 2.1 of the PSP will be revised to remove references identify how samples can be collected given the above limitations, including removing the use of the Geoprobe.

Commenting Organization: Ohio EPA — Commentator: OFFO
Section #: 2.1 — Pg. #: 2-1 — Line #: 18-25 — Code: C
Original Comment #: 3

Comment: a) The text does not mention the depth of the soil pile. Is this information unavailable?

b) Please explain why samples aren't being collected at the bottom of the pile? Ohio EPA believes it is important to collect samples from the bottom of the pile.

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Response: a) The depth of the soil pile varies across the pile, but it is approximately 8 to 10 feet thick at and near its center.

b) Agree.

Action: Samples will be collected from soil just above the floor at the two locations (northwest and southwest) where potentially characteristic levels of perchloroethene were identified. These samples will be analyzed by toxicity characteristic leachate procedure (TCLP). The collection and analysis of these samples will be incorporated into Section 2 of the PSP.

Commenting Organization: Ohio EPA Commentator: OFFO
Section #: 2.1 Pg. #: 2-1 Line #: Code: C
Original Comment #: 4
Comment: At a minimum, TCLP samples should be collected from the northwest and southwest sides of the soil pile where the highest GC concentrations were found. The GC samples include IDs QHUT-SW-11-L, QHUT-SW-6-L, and QHUT-NW-10-L.

Response: Agree.

Action: Collect additional soil at locations QHUT-SW-11-L, QHUT-SW-6-L, and QHUT-NW-10-L for TCLP analysis (TCE and PCE). In addition, samples will be collected for TCLP analysis as stated in the action to Comment No. 3, plus 12 additional samples will be collected for TCLP analysis by biasing three increments (via photoionization detector scan) at four new randomly selected boring locations (one in each quadrant). Details of this second stage of sampling soil staged in Quonset Hut No. 1 will be incorporated Section 2 of the PSP.